



**VIA EMAIL ONLY**

February 15, 2019

Mr. Tom Bell  
Executive Director  
Huntington Municipal Development Authority  
City Hall  
800 5<sup>th</sup> Avenue  
Huntington, West Virginia 25701

RE: All Appropriate Inquiries at the Flint Group Printing Systems Parcels  
POTESTA Project No. 0101-18-0317

Dear Director Bell:

This letter presents the findings and opinion regarding the undertaking by the Huntington Municipal Development Authority (HMDA) of All Appropriate Inquiries (AAI), provided by environmental professionals at the engineering and environmental consulting firm Potesta & Associates, Inc. (POTESTA) as those terms are defined respectively by the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. Section 9601(35)(B)(iii) and 40 C.F.R. Section 312.

HMDA has conducted AAI at the subject properties, which consist of 4.35 acres of land identified as Warehouse Property (Huntington-Gideon Corp District, Tax Map 5, Parcel 43) and 3.44 acres of land identified as Parking Lot (Huntington-Gideon Corp District, Tax Map 5, Parcel 45) located at 5<sup>th</sup> Avenue and 24<sup>th</sup> Street in the City of Huntington, Cabell County, West Virginia. HMDA seeks to acquire these properties which are, at the time of the writing of this letter, owned by Flint Group Printing Systems. POTESTA provides that HMDA has effectively met the requirements of AAI as follows:

- 1) **Phase I Environmental Site Assessment (ESA):** HMDA's inquiries include the results of and information contained in a Phase I ESA previously conducted by environmental professionals at the firm Ramboll, for the current site owner Flint Group Printing Systems, to support AAI requirements for HMDA, dated August 2018 (**Attachment A**). POTESTA has reviewed this Phase I ESA conducted by Ramboll and found that it generally meets the requirements of ASTM International Standard 1527-13. The Ramboll Phase I ESA is dated within 180 days prior to the planned completion of the property acquisition by the purchaser HMDA.

In addition, POTESta has supplemented the Ramboll Phase I ESA since it was produced by conducting the following inquiries:

- a) POTESta has made inquiries to HMDA regarding any specialized HMDA knowledge of the subject Flint properties, the area surrounding the Flint properties, the conditions of adjoining properties, and any other HMDA experience relevant to the inquiry, for the purpose of identifying conditions indicative of releases or threatened releases at the subject Flint properties.
- b) POTESta has made inquiries to HMDA regarding any HMDA consideration whether the purchase prices of the subject Flint properties reasonably reflect the fair market value of the property, if the properties were not contaminated, and whether that price might be affected by the presence of releases of hazardous substances at the properties.
- c) During POTESta's conduct of inquiries of the subject Flint properties, POTESta has taken into account, and made inquiries to HMDA regarding, commonly known or reasonably ascertainable information within the local Huntington community about the subject Flint properties, and considered such information when seeking to identify conditions indicative of releases or threatened releases of hazardous substances at the properties.
- d) HMDA, in coordination with POTESta and with HMDA's environmental legal counsel at the Ward Washington Law firm, made inquiries to officials at the U.S. Environmental Protection Agency (USEPA), Region 3 regarding the current permitting status and known environmental conditions at the site. This resulted in furnishing of information to HMDA which POTESta reviewed, from the BASF Corporation, a previous owner of the subject properties, and a party that is conducting a facility-lead RCRA corrective action at the properties and including portions of the surrounding properties situated immediately to the south of 5<sup>th</sup> Avenue. This HMDA consultation with USEPA Region 3 resulted in USEPA providing a status letter to HMDA regarding the subject properties (**Attachment B**).

#### **Additional Environmental Site Assessment Activities**

In addition to the activities documented above to meet AAI requirements, HMDA and POTESta have conducted further inquiries into releases or threatened releases of hazardous substances at the subject Flint properties. These included the following:

1. POTESta provided HMDA a "Qualitative Environmental Site Assessment and Development Feasibility Study Report for Flint Group Pigments – Parcels 43 & 45, Huntington, West Virginia" which, among other matters, considered sample collection


and laboratory analysis of environmental conditions in surface and subsurface soils extracted from the subject properties in November 2018 (**Attachment C**).

2. Based on the results of the Qualitative Environmental Site Assessment referenced immediately above, POTESTA recommended and HMDA approve the collection and analysis of additional surface and selected subsurface soil samples from the subject Flint properties, for the purpose of further characterizing and delineating potential PCB contamination. A table and mapping summarizing the results of that sampling and analysis is presented in **Attachment D**.

Based upon the information resulting from the inquiries outlined above, the undersigned environmental professional at POTESTA provides the opinion that HMDA has properly conducted assessments into the environmental conditions at the subject Flint properties, meeting the requirements of AAI.

Sincerely,

POTESTA & ASSOCIATES, INC.



David J. Corsaro, LRS  
Senior Scientist

DJC/mh

Attachments